

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

RAMY SHAKER, TRACY KNIERIM,
LISA BARTA, and CHERYL
WELLNITZ, individually and on behalf
of a class of similarly situated
individuals,

Plaintiffs,

v.

CHAMPION PETFOODS USA, INC.
and CHAMPION PETFOODS LP,

Defendants.

Case No. 2:18-cv-13603-LJM-DRG

Honorable Laurie J. Michelson

**STIPULATION AND ORDER TO EXTEND EXPERT DISCOVERY
AND CLASS CERTIFICATION DEADLINES**

Plaintiffs Ramy Shaker, Tracy Knierim, Lisa Barta, and Cheryl Wellnitz (collectively, “Plaintiffs”) and Defendants Champion Petfoods USA Inc. and Champion Petfoods LP (collectively, “Champion,” and together, with Plaintiffs, the “Parties”), by and through their counsel of record, respectfully submit this Stipulation and Order to Extend Expert Discovery and Class Certification Deadlines by thirty days. In support of this stipulation, the Parties state as follows:

1. The Parties have made initial attempts at mediation on August 26, 2020 in front of Judge Matz in the Northern District of New York but were unsuccessful.
2. The Parties have subsequently scheduled another mediation in front of Judge Matz in the Northern District of New York for January 4, 2021.

3. Given their concerted effort to mediate these cases, the Parties request that the Court extend all expert disclosure and class certification deadlines by thirty days as set forth below:

The Court's Case Management Requirements and Scheduling Order [Docket 33] sets forth the following dates:

EVENT	DEADLINE
Affirmative Expert Reports	January 25, 2021
Rebuttal Expert Reports	February 25, 2021
Expert Discovery Cutoff	March 31, 2021
Challenges to Experts	April 30, 2021
Class Certification Motion	April 30, 2021

The Parties stipulate to a thirty (30) day extension on the above-referenced dates as set forth below:

EVENT	DEADLINE
Affirmative Expert Reports	February 25, 2021
Rebuttal Expert Reports	March 25, 2021
Expert Discovery Cutoff	April 30, 2021
Challenges to Experts	May 27, 2021
Class Certification Motion	May 27, 2021

IT IS SO ORDERED

Dated: December 28, 2020

s/Laurie J. Michelson
LAURIE J. MICHELSON
UNITED STATES DISTRICT JUDGE

STIPULATED BY:

Dated: December 24, 2020

THE MILLER LAW FIRM, P.C.

/s/ E. Powell Miller

E. POWELL MILLER (P39487)
SHARON S. ALMONRODE (P33938)
DENNIS A. LIENHARDT (P81118)
950 West University Drive, Suite 300
Rochester, MI 48307
Telephone: (248) 841-2200
Facsimile: (248) 652-2852
E-mail: epm@millerlawpc.com
ssa@millerlawpc.com
dal@millerlawpc.com

LOCKRIDGE GRINDAL NAUEN P.L.L.P.
ROBERT K. SHELQUIST
REBECCA A. PETERSON (241858)
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Telephone: (612) 339-6900
Facsimile: (612) 339-0981
E-mail: rkshelquist@locklaw.com
rapeterson@locklaw.com

ROBBINS LLP
KEVIN A. SEELY (199982)
5040 Shoreham Place
San Diego, CA 92122
Telephone: (619) 525-3990
Facsimile: (619) 525-3991
E-mail: kseely@robbinsllp.com

GUSTAFSON GLUEK, PLLC
DANIEL E. GUSTAFSON
KARLA M. GLUEK
RAINIA C. BORRELLI
Canadian Pacific Plaza
120 South 6th Street, Suite 2600
Minneapolis, MN 55402
Telephone: (612) 333-8844
Facsimile: (612) 339-6622
E-mail: dgustafson@gustafsongluek.com
kgluek@gustafsongluek.com
rborrelli@gustafsongluek.com

CUNEO GILBERT & LADUCA, LLP
CHARLES LADUCA
KATHERINE VAN DYCK
4725 Wisconsin Avenue NW, Suite 200
Washington, D.C. 20016
Telephone: 202-789-3960
Facsimile: 202-789-1813
E-mail: charles@cuneolaw.com
kvandyck@cuneolaw.com

LITE DEPALMA GREENBERG, LLC
JOSEPH DEPALMA
SUSANA CRUZ HODGE
570 Broad Street, Suite 1201
Newark, NJ 07102
Telephone: (973) 623-3000
E-mail: jdepalma@litedepalma.com
scruzhodge@litedepalma.com

WEXLER WALLACE LLP
KENNETH A. WEXLER
MICHELLE PERKOVIC
55 West Monroe, Suite 3300
Chicago, IL 60603
Telephone: (312) 346-2222
Facsimile: (312) 346-0022
E-mail: kaw@wexlerwallance.com
mp@wexlerwallace.com

Attorneys for Plaintiffs

Dated: December 24, 2020

GREENBERG TRAURIG, P.A.

By: David A. Coulson (w/consent)
DAVID A. COULSON (*pro hac vice*)
333 S.E. 2nd Avenue, Suite 4400
Miami, FL 33131
Telephone: (305) 579-0754
E-mail: coulsond@gtlaw.com

LAW OFFICES OF JOHN J. O'SHEA
JOHN J. O'SHEA
18000 Mack Avenue
Grosse Pointe, MI 48230
Telephone: (313) 884-2265
E-mail: oshealaw@att.net

*Attorneys for Defendants, Champion Petfoods USA,
Inc. and Champion Petfoods LP*